

## **Plaintiffs' Exhibit F**

**CASSIDY MONTANA WOOD**

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

-----  
SIERRA BOUCHER, LILY ENGBRECHT,  
NATASSIA TUHOVAK, HANNAH WHELAN, and  
CASSIDY WOOD,

Plaintiffs,

- against - Case No.  
1:22-cv-00381-CCR

TRUSTEES OF CANISIUS COLLEGE,

Defendant.  
-----

Examination before trial of **CASSIDY**  
**MONTANA WOOD**, Plaintiff, taken pursuant to the  
Federal Rules of Civil Procedure, in the law  
offices of HODGSON RUSS LLP, The Guaranty Building,  
140 Pearl Street, Suite 100, Buffalo, New York, on  
August 23, 2024, commencing at 9:37 a.m., before  
LYNNE E. DIMARCO, Notary Public.

11:44:11 1           **A.**     No.

11:44:11 2           **Q.**     Was there any kind of finished work  
11:44:14 3 product that was created after this trip?

11:44:16 4           **A.**     No.

11:44:22 5           **Q.**     Was a student named [REDACTED] on  
11:44:27 6 this trip?

11:44:27 7           **A.**     Yes, [REDACTED] was on that trip.  
11:44:41 8 That was definitely another area of concern that  
11:44:44 9 had come up, because I had heard from [REDACTED]  
11:44:48 10 that they had like a more than professional  
11:44:51 11 relationship.

11:44:52 12           But, again, I heard it secondhand. She did  
11:44:56 13 kind of get like some special treatment on the  
11:44:59 14 trip. She would get her own room when the rest of  
11:45:02 15 us were sharing. She was older than us.

11:45:05 16           And I didn't really see what role she had as  
11:45:09 17 any sort of TA or anything like that. So it was  
11:45:15 18 definitely odd, but because I didn't personally  
11:45:19 19 witness anything beyond his usual over invasive  
11:45:25 20 like casual touching, what he saw as casual, it  
11:45:30 21 didn't raise to the level of alarm that would cause  
11:45:35 22 me to say anything about it beyond to my friends.

11:45:42 23           **Q.**     So at the time of the trip, were you

11:45:45 1 alarmed by their relationship, by the relationship

11:45:50 2 k 

11:45:53 3 

11:45:55 4 Q. Why were you grossed out?

11:45:57 5 A. They had a massive age gap and he was  
11:46:01 6 her professor and I think that's inappropriate.

11:46:03 7 So I thought it was inappropriate, but  
11:46:03 8 alarming, no, because I didn't necessarily feel  
11:46:07 9 like personally in peril because of it.

11:46:10 10 Q. What was inappropriate about their  
11:46:12 11 relationship that you saw?

11:46:14 12 A. I think the fact that he was in a  
11:46:16 13 position of power over her as a professor. Like  
11:46:20 14 naturally that to me is alarming. I don't think  
11:46:24 15 it's appropriate for an educator to have a  
11:46:27 16 relationship with a student, period.

11:46:30 17 And as someone who worked with students for  
11:46:32 18 many years like I feel very strongly about that.  
11:46:33 19 Even if they are both consenting adults, they had a  
11:46:36 20 relationship that naturally had a power dynamic.

11:46:40 21 And I think that is inappropriate, I thought  
11:46:43 22 that it was inappropriate at the time and I still  
11:46:46 23 think that's inappropriate.



11:46:47 1 Q. So you're saying -- strike that.

11:46:49 2 So you heard from [REDACTED] that they had a  
11:46:53 3 relationship, right?

11:46:54 4 A. Yes.

11:46:54 5 Q. Did you see them having anything that  
11:46:57 6 indicated a relationship between them?

11:46:58 7 MS. NANAU: Objection to form, beyond what  
11:47:02 8 she's already testified to, is that what you're  
11:47:06 9 asking?

11:47:06 10 BY MS. NAASSANA:

11:47:07 11 Q. Yes, yeah.

11:47:07 12 A. He would touch her in the same way he  
11:47:10 13 would touch all of his female students, so like,  
11:47:14 14 you know, touch her hair, you know, touch her hips.  
11:47:17 15 But, again, it was the same degree of  
11:47:20 16 inappropriateness that I at that point was groomed  
11:47:24 17 to think was acceptable.

11:47:27 18 And so beyond that I did not see them  
11:47:31 19 explicitly kissing on the mouth or anything to that  
11:47:35 20 caliber, no.

11:47:38 21 Q. So if you saw Dr. Noonan touch [REDACTED]  
11:47:41 22 [REDACTED] in the same way he touched other students,  
11:47:46 23 why did you think this was inappropriate?

11:47:48 1           **MS. NANAU:** I'm going to object to the form,  
11:47:51 2 misstates the testimony, you can answer.

11:47:54 3           **THE WITNESS:** He was very open with students  
11:47:57 4 about his escapades and his like sex life and  
11:48:02 5 relationships. And I knew that [REDACTED] as a  
11:48:05 6 person and as my friend, that is not something he  
11:48:09 7 would make up or say lightly. He was a very -- he  
11:48:12 8 still is a very serious person and he was not one  
11:48:15 9 for gossip.

11:48:17 10           So the fact that he said that he knew from  
11:48:18 11 Noonan that they had a relationship, I knew that  
11:48:24 12 was true. I took that very much as true and I  
11:48:28 13 didn't feel like I needed to see it for myself to  
11:48:30 14 know that it was true, because Jay was not someone  
11:48:33 15 to sensationalize something like that or to get  
11:48:38 16 gratification of like spreading gossip, in  
11:48:40 17 quotations.

11:48:40 18           **BY MS. NAASSANA:**

11:48:41 19           **Q.** Did [REDACTED] strike that. Sorry.

11:48:41 20           Did Dr. Noonan ever tell you that he had a  
11:48:43 21 relationship with [REDACTED]?

11:48:46 22           **A.** He did not specifically call out  
11:48:49 23 Courtney to me, personally. Other people I knew he

11:48:55 1 did explicitly call out that it was her, but he  
11:48:59 2 frequently in subsequent years referred to his  
11:49:02 3 relationship with a 30-year-old student.

11:49:04 4 And there was not any doubt in my mind that  
11:49:09 5 he was talking about [REDACTED]n.

11:49:12 6 **MS. NAASSANA:** I'm going to move to strike  
11:49:13 7 the non-responsive portions of the answer. Lynne,  
11:49:15 8 could you please repeat the original question.

11:49:17 9 (The above-requested question was then  
11:49:17 10 read by the reporter.)

11:49:28 11 **MS. NANAU:** Objection to the form, asked and  
11:49:29 12 answered, you may answer.

11:49:30 13 **BY MS. NAASSANA:**

11:49:31 14 **Q.** So yes or no, what's the answer to that  
11:49:33 15 question?

11:49:34 16 **A.** No.

11:49:37 17 **Q.** Did Courtney Moran ever tell you that  
11:49:41 18 she had a relationship with Dr. Noonan?

11:49:43 19 **A.** No.

11:50:06 20 **Q.** I want to turn to the Uganda trip for a  
11:50:10 21 moment. The trip to Uganda, was this a Canisius  
11:50:16 22 Ambassadors for Conservation trip?

11:50:17 23 **A.** Yes, it was.

12:14:24 1 that it's a really challenging -- it's a really  
12:14:30 2 challenging path to pursue. And I was still very  
12:14:37 3 much interested in pursuing it, but it wasn't a  
12:14:37 4 meeting that was particularly encouraging.

12:14:41 5 **Q.** Did you schedule a follow-up meeting  
12:14:44 6 with Dr. Suchak after that development session?

12:14:47 7 **A.** Not to my knowledge. Again, I had  
12:14:53 8 regular -- well, like once a semester check-ins  
12:14:57 9 with her on just like my academic progression and  
12:15:00 10 class selection in general.

12:15:03 11 So, you know, I think the graduate school  
12:15:04 12 session gave me enough information that I didn't  
12:15:08 13 feel the need for a follow-up one-on-one.

12:15:28 14 **Q.** Okay. So at some point, Ms. Wood, you  
12:15:43 15 applied for the Project Tiger trip to India, right?

12:15:47 16 **A.** Correct.

12:15:47 17 **Q.** What was the purpose of that trip?

12:15:50 18 **A.** The purpose of that trip was to create  
12:15:53 19 a film documentary about both like wild tiger  
12:15:58 20 conservation and also the issue of private tiger  
12:16:03 21 ownership across the United States.

12:16:07 22 **Q.** Was there a limit on the number of  
12:16:10 23 students who could go on the trip?

12:21:49 1           **A.**     No.

12:21:49 2           **Q.**     So were -- strike that.

12:21:52 3           Did any other students other than Sierra and  
12:21:56 4           ██████████ work behind the camera filming?

12:22:01 5           **A.**     No.

12:22:01 6           **Q.**     Okay. Were Sierra and ██████████ a  
12:22:11 7           going to be responsible for editing that footage  
12:22:15 8           after the trip?

12:22:20 9           **A.**     Yes.

12:22:21 10          **Q.**     So if I say -- strike that.

12:22:28 11          So were Sierra and ██████████ part of  
12:22:35 12          the Project Tiger video team?

12:22:37 13          **A.**     Yes.

12:22:37 14          **Q.**     Okay. So how did your group -- how did  
12:22:45 15          the Project Tiger group prepare for India?

12:22:48 16          **A.**     So as I previously mentioned, I was  
12:22:52 17          deeply prepared, I had spent hundreds of hours  
12:22:57 18          preparing. But the actual India portion of the  
12:23:01 19          trip, he didn't give us any reading materials until  
12:23:05 20          after we had left for India.

12:23:08 21                 And so there were some reading materials  
12:23:11 22          very unmemorable to be honest. I think there were  
12:23:16 23          more relevant things we could have been reading.

12:23:19 1           So there was that, but there was also  
12:23:22 2 preparing for like actually being on camera, which  
12:23:24 3 involved he made us have a pre-meeting with him to  
12:23:27 4 bring the clothes we were going to wear and try  
12:23:28 5 them on to make sure he found them to be  
12:23:32 6 acceptable.

12:23:33 7           We had like group meetings leading up to it  
12:23:39 8 to the point of Hannah Whelan who was studying  
12:23:45 9 abroad in Ireland at the time was staying up till  
12:23:45 10 odd hours of the night to be able to be phoned in,  
12:23:49 11 because he wanted those touch points with us.

12:23:52 12           And so, yeah, a series of group meetings of  
12:23:56 13 like clothing reviews and of like conversations as  
12:24:02 14 to what to expect going in.

12:24:04 15           **Q.**     How often did you meet as a group?

12:24:08 16           **MS. NANAU:**   Objection to the form, you may  
12:24:10 17 answer.

12:24:10 18           **THE WITNESS:**   It was pretty ad hoc based on  
12:24:15 19 availability and Noonan's whim when he felt like he  
12:24:20 20 had something to talk to us about.

12:24:21 21           As a full group, I would say as we got into  
12:24:24 22 like October and November we were meeting at least  
12:24:28 23 two or three times a month.

12:24:29 1 And then like in smaller factions we would  
12:24:33 2 be meeting with him separately. So I know Sierra  
12:24:36 3 and [REDACTED] were meeting with him  
12:24:38 4 separately on how to prepare for the actual  
12:24:38 5 filming.

12:24:40 6 Lily and I were meeting with him a lot more  
12:24:43 7 frequently than the rest of the group pertaining to  
12:24:46 8 all this advanced research we were doing, yeah.

12:24:52 9 **BY MS. NAASSANA:**

12:24:53 10 **Q.** Where would your meetings happen, did  
12:24:58 11 the location change or where did they happen?

12:25:00 12 **A.** Yeah, the location would change.  
12:25:03 13 Sometimes they would be in one of the library  
12:25:06 14 conference rooms, sometimes they would be in the  
12:25:08 15 smaller conference rooms above Old Main. The  
12:25:12 16 smaller group meetings would always be in his lab  
12:25:12 17 or in his office.

12:25:14 18 **Q.** Did you travel anywhere to prepare for  
12:25:17 19 the Project Tiger trip?

12:25:20 20 **A.** I mean, to Florida.

12:25:21 21 **Q.** Other than Florida?

12:25:22 22 **A.** But other than Florida, no. At least  
12:25:31 23 in advance of India.

12:25:38 1           **MS. NAASSANA:** May I this marked as  
12:25:40 2 Exhibit U.  
12:25:40 3 **The following was marked for Identification:**  
4       **EXH. U**                           **Bates stamped Canisius 01376**  
12:26:04 5           **BY MS. NAASSANA:**  
12:26:08 6           **Q.** This is an e-mail from Dr. Noonan dated  
12:26:11 7 October 18th, 2018 right?  
12:26:15 8           **A.** Uh-huh, yes.  
12:26:17 9           **Q.** This e-mail references a taping at the  
12:26:23 10 Buffalo Zoo. And it's addressed to the Project  
12:26:29 11 Tiger students. Did you attend this taping at the  
12:26:32 12 Buffalo Zoo?  
12:26:33 13           **A.** Yes, I did.  
12:26:34 14           **Q.** What happened?  
12:26:35 15           **A.** I got there late because I had a work  
12:26:38 16 commitment. And so I traveled separately than the  
12:26:42 17 rest of the group and parked outside of the zoo and  
12:26:45 18 met Noonan and the group at one of the back gates.  
12:26:50 19           We went in, we mic'd up doing Noonan's usual  
12:26:56 20 style of very prescriptively putting them through  
12:27:00 21 our shirts for us.  
12:27:01 22           And we went into like a Buffalo Zoo  
12:27:03 23 conference room. I can't remember if we called in



12:27:06 1 Hannah Whelan or not. And we asked interview  
12:27:10 2 questions to I think it was the carnivore curator  
12:27:15 3 of the zoo, yeah.

12:27:17 4 Q. Okay. And who did the taping at this  
12:27:22 5 Buffalo Zoo outing?

12:27:24 6 A. I want to say that one was Noonan.

12:27:27 7 Q. Okay.

12:27:28 8 A. Like I don't remember it being Sierra  
12:27:31 9 or [REDACTED] but it could have been, but I know  
12:27:34 10 Noonan was behind the camera for at least part of  
12:27:38 11 that interview.

12:27:43 12 Q. Okay.

12:27:48 13 MS. NANAU: Do you want to have that for  
12:27:49 14 your records?

12:27:55 15 MS. NAASSANA: I think another few minutes  
12:27:56 16 and we can take a lunch break, if you want.

12:27:59 17 MS. NANAU: That would be great. Thank you.  
12:28:15 18 Off the record.

12:28:20 19 (Discussion off the record: 12:28 p.m.)

12:28:55 20 MS. NAASSANA: Can I have this marked.

12:28:55 21 **The following was marked for Identification:**

22 EXH. V Bates stamped Canisius 01379  
23 through 01380

12:29:29 1 **BY MS. NAASSANA:**

12:29:29 2 **Q.** So these are e-mails from Dr. Noonan in  
12:29:33 3 October of 2018, right?

12:29:35 4 **A.** Uh-huh.

12:29:36 5 **MS. NANAU:** Yes?

12:29:37 6 **THE WITNESS:** Yes, I'm so sorry.

12:29:39 7 **MS. NANAU:** It's okay.

12:29:43 8 **BY MS. NAASSANA:**

12:29:44 9 **Q.** He wrote, quote, what would be your  
12:29:46 10 availability for a Project Tiger road trip to  
12:29:49 11 Florida with stops along the way over spring break.

12:29:56 12 **A.** Yes.

12:30:01 13 **Q.** You were interested in this potential  
12:30:04 14 spring break trip to Florida, right?

12:30:07 15 **A.** I wasn't just interested in it, I had  
12:30:11 16 planned it. I mean, I'm laughing because it says  
12:30:14 17 I've been developing a thought, as I have been  
12:30:18 18 further exploring the idea of visiting tiger sites  
12:30:22 19 in the U.S.

12:30:23 20 He didn't do that, that was me. I was the  
12:30:25 21 one who had a proposed itinerary of like what that  
12:30:28 22 could look like that I had discussed with him.

12:30:30 23 So, yes, I was onboard with it, I suggested

12:30:33 1 it.

12:30:35 2           **Q.**     When did you suggest this to  
12:30:38 3 Dr. Noonan?

12:30:38 4           **A.**     Late September, early October. Around  
12:30:41 5 the same time I was developing that institutions  
12:30:45 6 list, I realized that most of them are in the  
12:30:48 7 southern U.S.

12:30:49 8                   And there was a cluster in Florida but there  
12:30:52 9 was also a cluster in areas like Louisiana and more  
12:30:56 10 towards like the Midwest. And we couldn't do them  
12:30:59 11 all at once.

12:31:01 12                   So there had been a lot of discussion  
12:31:03 13 between him, Lily and I about whether it made sense  
12:31:06 14 to do like one big trip or if like a smaller trip  
12:31:10 15 to one area and then another trip to another area  
12:31:14 16 would make sense.

12:31:16 17                   So this was really just an early scoping of  
12:31:18 18 whether it would be possible to have other people  
12:31:21 19 join that, and, yeah.

12:31:22 20           **Q.**     Okay. But and you confirmed your  
12:31:25 21 availability for that potential trip to Dr. Noonan,  
12:31:28 22 right?

12:31:28 23           **A.**     Correct.

12:31:29 1 Q. Okay. Thank you. When you arrived in  
12:31:37 2 India, where did you land?

12:31:41 3 A. We landed in Delhi.

12:31:54 4 Q. Who drove you from the airport to your  
12:31:58 5 next location?

12:32:00 6 A. When we first got there it was late and  
12:32:04 7 we went to a hotel to just kind of crash for the  
12:32:09 8 night. And I think that night it was some generic  
12:32:14 9 prearranged transportation.

12:32:18 10 And then the following day from that point  
12:32:23 11 on it was -- generally it was a mix between Manjeet  
12:32:28 12 who was our guide in India and Noonan himself.

12:32:31 13 Q. Did Dr. Noonan do any driving at all in  
12:32:35 14 India?

12:32:35 15 A. Yes, he did.

12:32:38 16 Q. What -- did any concerns or issues  
12:32:41 17 arise during that trip to India?

12:32:44 18 MS. NANAU: Objection to form, you may  
12:32:46 19 answer.

12:32:46 20 THE WITNESS: Yes. I mean, he constantly  
12:32:53 21 would do what he would call girl talk. He always  
12:32:56 22 wanted to know about our dating lives, our sex  
12:32:59 23 lives, if we would date someone older, what our

12:33:03 1 physical type was, would we like a guy who would  
12:33:06 2 get in a fist fight or bar or not. I mean, you  
12:33:10 3 name it, he asked it.

12:33:12 4 He would talk about his own personal  
12:33:15 5 relationships, his divorce with his wife, who he  
12:33:19 6 always called his wife in spite of their divorce.

12:33:23 7 He would talk about his 30-year-old graduate  
12:33:29 8 student girlfriend, and don't we think that's  
12:33:32 9 normal. Anything and everything under the sun  
12:33:35 10 regarding any sort of like sexual or romantic  
12:33:39 11 interaction.

12:33:40 12 There was nothing off base for him. Do we  
12:33:43 13 want kids, do we want to be pregnant, when would we  
12:33:49 14 want to be pregnant. Yeah, there was nothing  
12:33:51 15 off-limits in his eyes.

12:33:53 16 And one specific instance I remember is when  
12:33:57 17 we were driving to I think it was our second  
12:34:03 18 location which was near Kuno National Park, and he  
12:34:07 19 brought up previous complaints that had been made  
12:34:10 20 against him specifically by I think other  
12:34:14 21 professors and one student who had gotten really  
12:34:20 22 agitated with him and made accusations towards him  
12:34:23 23 at like some sort of forum.

12:34:25 1 And honestly, I mean, he droned on for a  
12:34:30 2 while and it had been a long day and I was just --  
12:34:33 3 I knew with him sometimes you just had to let him  
12:34:35 4 yap, because otherwise he would never shut up.

12:34:38 5 And I remember him specifically lamenting  
12:34:41 6 how silly it was that they would come up against  
12:34:46 7 him.

12:34:46 8 And that he was very close be President  
12:34:50 9 Hurley and he can't -- you know, he's untouchable.  
12:34:52 10 He said the words I'm untouchable. And really just  
12:34:58 11 like drove home what I had already gathered at that  
12:35:01 12 point, which is that he was a golden child of the  
12:35:05 13 administration, he was untouchable, and that his  
12:35:08 14 behavior was pervasively accepted day in and day  
12:35:12 15 out by the faculty he worked with and by the  
12:35:16 16 administration. But, again, it was just like  
12:35:19 17 another drop in the bucket.

12:35:20 18 **BY MS. NAASSANA:**

12:35:20 19 **Q.** Did he make these comments in India?

12:35:23 20 **A.** Yes.

12:35:24 21 **Q.** Okay. You mentioned you were going to  
12:35:27 22 a second location and he brought up previous  
12:35:30 23 complaints. What was the nature of those

12:35:34 1 complaints that he said that others had brought  
12:35:38 2 about him?

12:35:38 3 **A.** Well, he had talked about the Me Too  
12:35:40 4 Movement. And so while he didn't talk about any  
12:35:44 5 specific like harassing or sexual allegations  
12:35:47 6 against him, that was my assumption is that there  
12:35:51 7 was a nature of that there.

12:35:52 8 And then he brought up one for sure that was  
12:35:55 9 someone accusing him of being sexist. And then  
12:36:03 10 with the other one it was complaints about the  
12:36:05 11 quality of his science and, you know, what he did  
12:36:09 12 with rats at the university, and that's really all  
12:36:13 13 I remember.

12:36:31 14 **Q.** When you say the Me Too Movement, what  
12:36:36 15 do you mean, did somebody complain -- strike that.

12:36:38 16 Did Dr. Noonan tell you that somebody had  
12:36:41 17 complained about something related to Me Too  
12:36:46 18 Movement and him?

12:36:46 19 **A.** He had talked about how good men, good  
12:36:51 20 men were being put on blast because people these  
12:36:59 21 days are so sensitive. And that, you know, implied  
12:37:03 22 to me that he was likening himself as one of those  
12:37:09 23 good men who was just getting complaints because

12:37:12 1 people were too sensitive and not because they were  
12:37:16 2 merited.

12:37:16 3 And he specifically referenced Bill Cosby  
12:37:20 4 and how he didn't think what Bill Cosby did was  
12:37:24 5 that bad.

12:37:25 6 Q. Did he say somebody complained about  
12:37:28 7 something he said about the Me Too Movement or --

12:37:31 8 A. No, he was just broad stroke talking  
12:37:34 9 about the Me Too Movement and likening it to his  
12:37:38 10 experience of having complaints raised against him.

12:37:42 11 Q. Okay. You mentioned that he was  
12:37:44 12 accused of being sexist or -- strike that.

12:37:48 13 You mentioned that he told you he was  
12:37:51 14 accused of being sexist, right?

12:37:54 15 A. Yes.

12:37:55 16 Q. Who, if you know, did he -- strike  
12:37:55 17 that.

12:37:59 18 Did he tell you who accused him of being  
12:38:02 19 sexist?

12:38:02 20 A. If he did, I don't remember.

12:38:08 21 Q. Did he use the word complaints in that  
12:38:12 22 conversation?

12:38:13 23 A. Yes.



12:40:42 1 these complaints?

12:40:42 2 **A.** Not that I recall.

12:40:43 3 **Q.** Okay. How did this conversation get  
12:40:58 4 brought up?

12:41:00 5 **MS. NANAU:** Objection to form, you can  
12:41:02 6 answer.

12:41:05 7 **THE WITNESS:** I couldn't tell you the  
12:41:07 8 specific segue into this conversation. All I can  
12:41:10 9 say is that this was constantly the nature of  
12:41:14 10 conversations with him was like overly  
12:41:16 11 inappropriate sexualized in nature, sharing way  
12:41:21 12 more than anyone should share with a student.

12:41:26 13 And so it just felt like par for the course.  
12:41:29 14 It felt like any other regular conversation with  
12:41:31 15 him, because that was always the nature of how we  
12:41:35 16 interacted with him on any given day.

12:41:38 17 **BY MS. NAASSANA:**

12:41:39 18 **Q.** So and during this entire conversation  
12:41:42 19 was Lily asleep?

12:41:44 20 **A.** Yes.

12:41:44 21 **Q.** And did anyone else hear this  
12:41:47 22 conversation, or no?

12:41:48 23 **A.** Again, not that I recall. I'm pretty

12:41:51 1 sure she was the only one in the car. Nobody  
12:41:54 2 wanted to sit back with her in case she yacked.

12:41:59 3 Q. Poor Lily. Did he tell you at all who  
12:42:10 4 the -- I think you sort of answered this already,  
12:42:12 5 but did he tell you at all the name of the  
12:42:14 6 professor or the name of anyone who had complained  
12:42:18 7 about him, or you just can't remember?

12:42:21 8 A. I was going to say I can't answer that  
12:42:24 9 with any confidence.

12:42:25 10 Q. Okay. Did he tell you when these  
12:42:34 11 complaints had occurred?

12:42:39 12 A. He said over the years.

12:42:41 13 Q. Okay. Okay.

12:42:43 14 A. But he didn't tell me any specific  
12:42:46 15 dates.

12:42:46 16 Q. After you had this conversation with  
12:42:49 17 Dr. Noonan, did you share it with any of the other  
12:42:52 18 students on the trip?

12:42:53 19 A. Yes.

12:42:54 20 Q. Who?

12:42:54 21 A. Honestly, probably all of them, because  
12:42:57 22 later on that trip is when he -- I mean, early on  
12:43:02 23 in the trip he was being problematic, but as the

12:43:05 1 trip progressed, he became increasingly like in an  
12:43:10 2 escalating way more and more problematic.

12:43:13 3 And we were spending every -- every day and  
12:43:15 4 every night and every waking moment we could get  
12:43:16 5 away from him talking about him and what to do  
12:43:20 6 about his behavior. And so it was a hundred  
12:43:23 7 percent relevant to those conversations.

12:43:25 8 And I'm sure I mentioned it at some point,  
12:43:29 9 because, again, we were already trying in India to  
12:43:34 10 come to terms with who he was as a person and what  
12:43:39 11 we needed to potentially do about it.

12:43:42 12 Q. When you were in India, did you share  
12:43:45 13 that conversation that you had with Dr. Noonan with  
12:43:47 14 your parents or siblings?

12:43:48 15 A. We didn't have connectivity to do so,  
12:43:53 16 so, no, you know. The first place we stayed for  
12:43:58 17 any significant length of time was Tiger Don  
12:44:05 18 (phonetic) which is outside of Ranthambhore  
12:44:05 19 National Park, and I think we had some Wi-Fi there.

12:44:08 20 But the -- as he progressed and got worse,  
12:44:10 21 we had gone at that point to some lodge outside of  
12:44:14 22 Kuno National Park and our only form of  
12:44:17 23 connectivity was like one desktop computer in the

12:44:22 1 lobby of the lodge that had like a 10-minute time  
12:44:26 2 limit, was really slow, so we were really isolated.  
12:44:29 3 There wasn't a way to really communicate what was  
12:44:33 4 going on at that point to anyone.

12:44:35 5 Q. Okay. You mentioned that Dr. Noonan's  
12:44:47 6 behavior on the trip was problematic. What do you  
12:44:50 7 mean by that?

12:44:52 8 A. I mean he was rude and racist to the  
12:44:55 9 guides and the locals, you know. For example, our  
12:45:01 10 guide, Manjeet, actually took it upon himself to  
12:45:06 11 start tipping like our drivers and such on game  
12:45:08 12 drives, because the amount that Noonan was giving  
12:45:11 13 was so insulting that he was afraid it was going to  
12:45:13 14 impact his professional relationships with them.

12:45:16 15 And would constantly, you know, say like,  
12:45:19 16 oh, I don't understand what you're saying to  
12:45:21 17 someone who was very articulate, it's not that hard  
12:45:25 18 to understand someone who has English as a second  
12:45:29 19 language.

12:45:30 20 And, honestly, it's really impressive for  
12:45:31 21 anyone to have learned English as a second  
12:45:31 22 language. So just to begin with he was terrible  
12:45:35 23 and I was embarrassed to be with him in that

13:54:21 1 cried on the floor of the bathroom, that's  
13:54:21 2 something I carried but it was not a rape that  
13:54:24 3 happened to me, no.

13:54:35 4 **Q.** And this information that you heard  
13:54:37 5 about the cross country team, that was information  
13:54:42 6 that you heard secondhand?

13:54:44 7 **A.** Correct, through Lily, yes.

13:54:46 8 **Q.** Did you, yourself, participate on the  
13:54:49 9 cross country team?

13:54:50 10 **MS. NANAU:** Objection, asked and answered,  
13:54:52 11 you may answer.

13:54:52 12 **THE WITNESS:** No, I did not.

13:54:52 13 **MS. NAASSANA:** I never asked if she  
13:54:53 14 participated on the cross country team.

13:54:53 15 **MS. NANAU:** You asked about activities.

13:54:55 16 **BY MS. NAASSANA:**

13:54:56 17 **Q.** Did you -- just to clarify. Have you  
13:54:58 18 ever at any point participated as a member of the  
13:55:01 19 cross country and track and field team at Canisius?

13:55:05 20 **A.** No, I have not.

13:55:22 21 **Q.** Okay. The meeting with the Title IX  
13:55:30 22 office, that was with Ms. Walleshauser, right?

13:55:34 23 **A.** Correct.

13:55:34 1 Q. With Ms. Linda Walleshauser, right?

13:55:37 2 A. Correct.

13:55:37 3 Q. About how long was that meeting?

13:55:39 4 A. Less than 30 minutes.

13:55:41 5 Q. Did you speak up at that meeting?

13:55:44 6 A. I'm sure I chipped in, but we had  
13:55:47 7 decided going into the meeting that again we wanted  
13:55:50 8 to have a strategy of how we approached it and we  
13:55:54 9 wanted Hannah Whelan to kind of be representing the  
13:55:55 10 experience as the whole and then the rest of us add  
13:55:58 11 to that as needed.

13:56:02 12 Q. Where did that meeting take place?

13:56:06 13 A. In the Title IX, HR, whatever that  
13:56:09 14 office was.

13:56:10 15 Q. And what did Ms. Walleshauser say at  
13:56:14 16 that meeting?

13:56:14 17 A. I couldn't tell you one thing she said.  
13:56:18 18 I could tell you what she didn't say, which was  
13:56:22 19 sorry that happened to you, that's really messed  
13:56:22 20 up.

13:56:24 21 I do remember leaving knowing that she would  
13:56:25 22 be following up with us individually to get more  
13:56:29 23 information.

13:56:30 1 Q. Did you record this meeting with  
13:56:33 2 Ms. Walleshauser?

13:56:34 3 A. Not that day, no.

13:56:36 4 Q. Do you know if anyone else recorded  
13:56:38 5 that meeting?

13:56:39 6 A. To my knowledge, no one did.

13:56:41 7 Q. Do you remember Ms. Walleshauser's  
13:56:44 8 reaction during that meeting?

13:56:47 9 A. I would say she was pretty impassive,  
13:57:01 10 apathetic.

13:57:01 11 Q. Did you provide any documents to  
13:57:05 12 Ms. Walleshauser at that meeting as a group?

13:57:07 13 A. Not that I remember.

13:57:08 14 Q. Were you living on or off campus during  
13:57:11 15 that semester, spring 2019 semester?

13:57:15 16 A. I was living off campus.

13:57:17 17 Q. Where?

13:57:17 18 MS. NANAU: Objection, asked and answered,  
13:57:19 19 you may answer.

13:57:19 20 MS. NAASSANA: I was 1 Blain Avenue, which  
13:57:22 21 was like a street over from Canisius. It was just  
13:57:26 22 a house, student housing. I mean, not owned by  
13:57:31 23 Canisius but student housing.

13:57:36 1 **BY MS. NAASSANA:**

13:57:36 2 **Q.** Was it like an apartment building or a  
13:57:39 3 house?

13:57:39 4 **A.** No, it was a house.

13:57:41 5 **Q.** So you didn't have like an RA or  
13:57:44 6 resident director or something like that?

13:57:46 7 **A.** No.

13:57:47 8 **Q.** Okay. Were you aware of any concerns  
13:57:54 9 about Dr. Noonan being reported to any Canisius  
13:57:58 10 employee prior to February 11th, 2019?

13:58:00 11 **MS. NANAU:** Objection to form, other than  
13:58:01 12 what she's testified?

13:58:03 13 **MS. NAASSANA:** Yes.

13:58:03 14 **MS. NANAU:** Other than what you've already  
13:58:06 15 testified to.

13:58:06 16 **THE WITNESS:** At the time of the first  
13:58:09 17 meeting with Linda, I knew that Tassia had been in  
13:58:15 18 communication with Dr. Hogan and that Leanne Mason  
13:58:21 19 had also been in communication with Dr. Hogan, and  
13:58:21 20 as a result had been connected with Title IX.

13:58:57 21   
13:58:58 22 aware that they had gone to Dr. Hogan.

13:59:02 23 **BY MS. NAASSANA:**



13:59:02 1           **Q.**   Any other concerns about Dr. Noonan  
13:59:05 2 that you're aware of being reported to any Canisius  
13:59:08 3 employee prior to February 11, 2019 other than what  
13:59:13 4 you've already talked about?

13:59:14 5           **A.**   No, only what I heard through him.

13:59:16 6           **Q.**   Okay. -- strike that.

13:59:19 7           So after this group meeting on February  
13:59:32 8 11th, 2019, did you meet with Ms. Walleshauser  
13:59:36 9 individually?

13:59:37 10          **A.**   Yes, I did.

13:59:42 11          **Q.**   Do you remember when you next met with  
13:59:45 12 her?

13:59:46 13          **A.**   Yeah, it was like within a day or two,  
13:59:50 14 February 12th I think.

13:59:54 15          **Q.**   And what happened at that February 12th  
13:59:57 16 meeting with Ms. Walleshauser?

13:59:59 17          **A.**   In advance of that meeting she had  
14:00:02 18 asked us to prepare like individual accounts of  
14:00:08 19 like instances, specific instances with him, which  
14:00:14 20 was pretty difficult.

14:00:15 21           Because, again, we had a tight turnaround  
14:00:20 22 time. We were trying to get this done quickly.  
14:00:23 23 And also I didn't really have like much to go off

14:00:26 1 of for like the specific behaviors that she was  
14:00:29 2 looking for us to account.

14:00:31 3 I didn't have a great understanding of what  
14:00:32 4 like what sexual harassment truly entailed at that  
14:00:35 5 point, but I did, I produced a document for her and  
14:00:38 6 shared it with her leading into that meeting.

14:00:42 7 And, yeah, I went in and I met with her.  
14:00:46 8 And I remember she was -- I was expecting an  
14:00:51 9 opportunity to share to tell my story, like this  
14:00:56 10 was years of my life that I had spent with him.

14:00:59 11 And she was unsupportive, I would say --  
14:01:09 12 what's the word I'm looking for. I guess I'll say  
14:01:15 13 apathetic again, frigid, that's the word I'm  
14:01:17 14 looking for, she was frigid.

14:01:19 15 The questions she asked me I didn't feel  
14:01:22 16 like really were getting at the meat of what I had  
14:01:25 17 gone through. And they were -- felt to me like to  
14:01:28 18 be very victim blaming such as asking like why I  
14:01:34 19 hadn't said that I was uncomfortable to him.

14:01:37 20 It was short. Again, this was years that I  
14:01:39 21 had gone through and the meeting with Linda took  
14:01:42 22 like 15 or 20 minutes total. And I left it feeling  
14:01:48 23 very -- I had been optimistic before. I left

14:05:56 1           **A.**     Me, I did.

14:05:57 2           **Q.**     When?

14:05:59 3           **A.**     The night of February 11th.

14:06:02 4           **Q.**     Did anyone help you in drafting this  
14:06:06 5 statement?

14:06:06 6           **A.**     No.

14:06:07 7           **Q.**     Did you send the statement to anyone  
14:06:10 8 before sending it to Ms. Walleshauser?

14:06:13 9           **A.**     Not that I recall.

14:06:15 10          **Q.**     Did you see the statement that any  
14:06:18 11 other students had submitted to Ms. Walleshauser?

14:06:21 12          **A.**     I mean, I have now, but at the time,  
14:06:24 13 not that I recall.

14:06:30 14          **Q.**     Is there anything in this statement  
14:06:32 15 that you feel you left out?

14:06:35 16          **MS. NANAU:**   I'm going to object to the form  
14:06:38 17 of the question, you can answer.

14:06:40 18          **THE WITNESS:**   Yes.

14:06:41 19          **BY MS. NAASSANA:**

14:06:42 20          **Q.**     What do you feel you left out?

14:06:44 21          **A.**     I think this is a snapshot of what I  
14:06:50 22 experienced. I think when I wrote this, you know,  
14:06:53 23 these categories, lack of boundaries, culturally

14:06:57 1 incompetent, inappropriate touching, toxic  
14:07:00 2 masculinity, I made those up as like my own  
14:07:03 3 categorizations.

14:07:04 4           Looking back I would do more to stress how  
14:07:09 5 pervasive this behavior was. And I think I wrote  
14:07:12 6 it this way because Linda stressed that they needed  
14:07:16 7 like kind of specific instances. But it's  
14:07:21 8 difficult to pick out specific instances of like a  
14:07:24 9 serial predator.

14:07:26 10           And, again, I think this provides a good  
14:07:30 11 snapshot, but I think it was something that I  
14:07:33 12 pulled together quickly and without much guidance  
14:07:37 13 as to what should be included.

14:07:43 14           **Q.**    The last sentence of the first  
14:07:46 15 paragraph states, I do not wish to see him dragged  
14:07:51 16 through the mud nor do I wish to discredit any of  
14:08:01 17 the good he has done in his years as an educator,  
14:08:01 18 but he is at the point where he should no longer be  
14:08:05 19 allowed in the presence of students.

14:08:07 20           Ms. Wood, what did you mean when you wrote I  
14:08:11 21 do not wish to see him dragged through the mud?

14:08:14 22           **A.**    As I previously mentioned, at that time  
14:08:18 23 even when coming forward against him, I really

14:12:04 1 that ultimately after whatever process or whatever  
14:12:10 2 they talked about that they decided that he needed  
14:12:14 3 to be removed from campus and not contact us about  
14:12:18 4 it.

14:12:18 5 So in that way I do believe they took  
14:12:22 6 relatively quick correction action, but there was  
14:12:26 7 still a period of time where I was continuing to  
14:12:28 8 have to engage with him and uphold the charade that  
14:12:32 9 everything was fine.

14:12:34 10 And he was hyper attune to us and he knew  
14:12:38 11 something was up. In that time he e-mailed us  
14:12:39 12 about canceling spring break, which had already  
14:12:43 13 been determined as something that would proceed.

14:12:45 14 And that took a toll. Like having to engage  
14:12:49 15 with him in the time that -- in the time after we  
14:12:54 16 reported it, it took a toll.

14:12:57 17 But I was -- I was ultimately pleased that  
14:13:01 18 he was removed from campus in the immediate  
14:13:05 19 short-term.

14:13:13 20 **BY MS. NAASSANA:**

14:13:14 21 **Q.** Did you ever see Dr. Noonan in person  
14:13:17 22 after you raised your concerns with the Title IX  
14:13:20 23 office on February 11th, 2019?

14:13:24 1           **A.**     I remember in February 2019, the exact  
14:13:30 2 date escapes me, we went to Canada to interview an  
14:13:35 3 artist for Project Tiger. And it was -- I  
14:13:39 4 distinctly remember feeling stressed about it and  
14:13:43 5 the fear that he was going to know that like a  
14:13:46 6 report, something was imminent in terms of his  
14:13:49 7 behavior.

14:13:50 8           And he told me during that interview to fix  
14:13:55 9 my face, because I was scowling the whole time,  
14:13:59 10 scowling because I was so just angry and stressed.  
14:14:05 11 And so I do recall that, but I can't recall the  
14:14:08 12 specific date.

14:14:09 13           **Q.**     When you say you met with an artist in  
14:14:11 14 Canada, with whom did you go?

14:14:14 15           **A.**     It was the full Project Tiger team and  
14:14:18 16 it was with Edward Spera.

14:14:20 17           **Q.**     Was this before or after you raised  
14:14:23 18 your complaints with the Title IX office on  
14:14:26 19 February 11th, 2019?

14:14:26 20           **A.**     Again, I don't recall the specific date  
14:14:29 21 of it, but I remember the fear around having  
14:14:32 22 reported.

14:14:34 23           **Q.**     Where in Canada was this?

14:14:36 1           **A.**     It was just across the border, it was  
14:14:39 2     like within 30 minutes from the border. And it was  
14:14:42 3     just like a night trip like out and back.

14:14:47 4           **Q.**     Was this after you had returned from  
14:14:50 5     India?

14:14:51 6           **A.**     It was after we had returned from  
14:14:53 7     India, I know it was in February, I just can't  
14:14:56 8     recall the specific date. And I can't recall if it  
14:14:59 9     was after like Tassia and [REDACTED] reports and we  
14:15:04 10    had discussed moving forward or if it was  
14:15:06 11    specifically after February 11th.

14:15:08 12          **Q.**     Is it your testimony that you saw  
14:15:11 13    Dr. Noonan in person after you met with the Title  
14:15:14 14    IX office on February 11th, 2019?

14:15:17 15          **A.**     Again, I can't recall the specific  
14:15:20 16    date, but I feel like I continued to engage with  
14:15:23 17    him.

14:15:23 18          **Q.**     You feel like you continued to engage  
14:15:26 19    with him or you did engage with him?

14:15:28 20          **MS. NANAU:**   Objection to form, you can  
14:15:30 21    answer the question if you can.

14:15:34 22          **MS. NAASSANA:**   Do you need the question  
14:15:36 23    repeated?

14:15:38 1           **THE WITNESS:** Yeah, that would be great.

14:15:38 2                   (The above-requested question was then  
14:16:00 3 read by the reporter.)

14:16:00 4           **MS. NANAU:** Same objection, you can answer  
14:16:03 5 if you can.

14:16:03 6           **BY MS. NAASSANA:**

14:16:04 7           **Q.** And we're talking about after your  
14:16:06 8 reports to the Title IX office.

14:16:10 9           **A.** My memory is that we did engage with  
14:16:13 10 him.

14:16:13 11           **Q.** What do you mean by engage with him?

14:16:16 12           **A.** Again, like we would constantly be  
14:16:19 13 dropping by his office. He would e-mail us and  
14:16:22 14 expect us to drop by. We were e-mailing  
14:16:25 15 constantly, so that's my memory of the engagement.

14:16:43 16           **Q.** Where did you go on this trip to  
14:16:46 17 Canada?

14:16:47 18           **MS. NANAU:** Objection to form, asked and  
14:16:50 19 answered, you may answer.

14:16:51 20           **THE WITNESS:** It was Edward Spera's studio  
14:16:54 21 in Canada. I can't tell you a specific town.

14:16:58 22           **BY MS. NAASSANA:**

14:16:58 23           **Q.** And why did you go there as a group?



14:27:26 1 don't have any recollection.

14:27:27 2 **BY MS. NAASSANA:**

14:27:28 3 **Q.** Okay. After you reported your concerns  
14:27:32 4 to the Title IX office on February 11th, 2019, did  
14:27:36 5 you ever attend a class with Dr. Noonan?

14:27:41 6 **A.** I wasn't in any of his classes at the  
14:27:45 7 time, so, no.

14:27:45 8 **Q.** Did you ever speak with him after  
14:27:48 9 February 11th, 2019?

14:27:50 10 **A.** I don't know. He called us all the  
14:27:53 11 time. I couldn't tell you whether I did or didn't.

14:28:02 12 **Q.** After you reported your concerns to the  
14:28:04 13 Title IX office February 11th, 2019, do you  
14:28:08 14 remember e-mailing Dr. Noonan about a speaker that  
14:28:10 15 was coming to campus?

14:28:11 16 **A.** Yes.

14:28:29 17 **MS. NAASSANA:** Okay. May I have this  
14:28:30 18 marked.

14:28:30 19 **The following was marked for Identification:**

20 **EXH. Y** **Bates stamped Canisius 05020**  
21 **through 05023**

14:29:18 22 **BY MS. NAASSANA:**

14:29:19 23 **Q.** So on February 12th, 2019 Dr. Noonan

14:29:22 1 invited you and other Project Tiger students to a  
14:29:27 2 breakfast and reception with a speaker. Is that  
14:29:30 3 correct?

14:29:30 4 **A.** Yes.

14:29:30 5 **Q.** Okay. And on the last page marked  
14:29:37 6 Canisius 05023 you responded, Dr. N, I am available  
14:29:42 7 for the breakfast, right?

14:29:43 8 **A.** Correct.

14:29:44 9 **Q.** So you sent this e-mail after your  
14:29:47 10 group meeting with Ms. Walleshauser with the Title  
14:29:50 11 IX office, right?

14:29:51 12 **A.** Correct.

14:29:52 13 **Q.** Did you report this communication from  
14:29:55 14 Dr. Noonan to anyone?

14:29:57 15 **MS. NANAU:** Objection to form, you may  
14:30:01 16 answer.

14:30:02 17 **THE WITNESS:** No. Again, because again we  
14:30:04 18 had no instruction to.

14:30:04 19 **BY MS. NAASSANA:**

14:30:05 20 **Q.** Did you ask whether your could or  
14:30:08 21 should respond to it after you received this  
14:30:11 22 e-mail?

14:30:11 23 **MS. NANAU:** Objection to the form, asked and

14:30:13 1 answered, you may answer.

14:30:15 2 **THE WITNESS:** No.

14:30:16 3 **BY MS. NAASSANA:**

14:30:16 4 **Q.** Did you tell Dr. Noonan that you didn't  
14:30:18 5 want to communicate with him?

14:30:21 6 **A.** Do you understand like everything I've  
14:30:24 7 said about him. Absolutely not, of course I did  
14:30:27 8 not.

14:30:29 9 **Q.** Okay. So you -- so you sent this  
14:30:43 10 e-mail on February 12th, 2019, even though you had  
14:30:48 11 already requested to have no contact with  
14:30:50 12 Dr. Noonan on February 11th, 2019, right?

14:30:54 13 **A.** Correct, the most I was told was  
14:30:57 14 retaliation is not acceptable. There was no -- no  
14:31:04 15 information given whatsoever of like what  
14:31:06 16 retaliation would consist of, like I had no concept  
14:31:12 17 of what would be appropriate or inappropriate  
14:31:14 18 contact with him in this time before he was put on  
14:31:18 19 leave. I was never told anything.

14:31:22 20 **Q.** Did you want to report this  
14:31:24 21 communication at the time?

14:31:30 22 **A.** I didn't feel like it had any relevance  
14:31:33 23 beyond what we had already reported.

14:42:43 1 had no illusion that this podcast would have any  
14:42:49 2 sort of an impact or mean anything to anyone, but  
14:42:50 3 we had to.

14:42:51 4 We were told we had to complete something to  
14:42:55 5 get credit. That what we had done up to that point  
14:42:58 6 wasn't enough to receive credit for the  
14:43:02 7 three-credit class and we had to produce something  
14:43:02 8 and Margulis was very set on it being a podcast.

14:43:21 9 **Q.** So take me back to when Dr. Noonan was  
14:43:25 10 placed on leave. When he was placed on leave, how  
14:43:28 11 often did you meet with Dr. Margulis with the  
14:43:34 12 Project Tiger group?

14:43:36 13 **A.** It was very ad hoc. I think ultimately  
14:43:41 14 after some time had passed we were aiming for  
14:43:44 15 weekly, because that's what we were supposed to be  
14:43:48 16 doing with Noonan.

14:43:49 17 But it was difficult to find a time that  
14:43:52 18 would work for everyone. Margulis it was difficult  
14:43:54 19 to at times to find a time that would work for her.  
14:43:57 20 And so it was kind of like, yeah, ad hoc.

14:44:46 21 **MS. NANAU:** If we could take a little break,  
14:44:49 22 is that okay?

14:44:50 23 **MS. NAASSANA:** Yeah.

15:13:13 1 answer if you can.

15:13:14 2 **THE WITNESS:** I don't remember any other  
15:13:15 3 options that we discussed.

15:13:18 4 **BY MS. NAASSANA:**

15:13:19 5 **Q.** So it's possible you discussed  
15:13:21 6 alternate arrangements, but you just don't  
15:13:24 7 remember?

15:13:24 8 **MS. NANAU:** Objection to the form, you may  
15:13:25 9 answer.

15:13:26 10 **THE WITNESS:** Yes.

15:13:39 11 **BY MS. NAASSANA:**

15:13:40 12 **Q.** Did you receive a grade -- strike that.  
15:13:42 13 What grade did you receive for the Project  
15:13:46 14 Tiger course?

15:13:46 15 **A.** I don't remember, probably an A.

15:13:52 16 **Q.** Have you ever identified that podcast  
15:13:54 17 work on your CV at any time?

15:13:58 18 **A.** Yeah, I mentioned it in passing on  
15:14:02 19 different résumés.

15:14:18 20 **Q.** Did the podcasts continue after this  
15:14:22 21 course related work ended?

15:14:23 22 **MS. NANAU:** Objection to the form, you can  
15:14:24 23 answer if you can.

15:36:57 1           **MS. NANAU:** Objection to the form of the  
15:36:58 2 question, you may answer.

15:36:59 3           **THE WITNESS:** I obtained credit, I just  
15:37:02 4 disagree about the definition of complete.

15:37:20 5           **BY MS. NAASSANA:**

15:37:21 6           **Q.** Were you able to graduate on time?

15:37:25 7           **A.** Yes, I graduated in May of 2020.

15:37:28 8           **Q.** What was the degree that you obtained?

15:37:31 9           **A.** An animal behavior ecology and  
15:37:35 10 conservation degree.

15:37:36 11           **Q.** Was that a Bachelor's of Science?

15:37:39 12           **A.** Yes.

15:37:39 13           **Q.** Were you a double major or just ABEC?

15:37:43 14           **A.** I graduated as just ABEC.

15:37:46 15           **Q.** Okay. Did you ask for any academic  
15:37:58 16 accommodations during or after February 2019?

15:38:02 17           **A.** I did ask for an extension on a paper  
15:38:08 18 in a course I had with Professor Workman. She gave  
15:38:11 19 me 24 hours, 24 hours in an extension.

15:38:16 20           After that I didn't feel particularly  
15:38:19 21 welcome to ask for any others, so that was the only  
15:38:23 22 extension I asked for.

15:38:25 23           **Q.** How much time did you ask for, how much

15:38:29 1 additional time did you ask for?

15:38:31 2 **A.** I just asked for an extension.

15:38:33 3 **Q.** Do you remember how much time you asked  
15:38:35 4 for?

15:38:35 5 **MS. NANAU:** Objection to the form, misstates  
15:38:36 6 the prior testimony, you may answer.

15:38:40 7 **THE WITNESS:** I didn't ask for a specific  
15:38:42 8 amount of time.

15:39:04 9 **MS. NAASSANA:** You didn't ask for -- okay.  
15:39:05 10 Strike that. May I have this marked.

15:39:05 11 **The following was marked for Identification:**

12 **EXH. AG** **Bates stamped Canisius 01871**

15:39:38 13 **BY MS. NAASSANA:**

15:39:39 14 **Q.** I'm showing you what's been marked as  
15:39:41 15 Exhibit AG. Do you recall receiving these e-mails,  
15:39:45 16 exchanging these e-mails?

15:39:50 17 **A.** Yes, I do.

15:39:51 18 **Q.** So on Thursday, February 21st you wrote  
15:39:54 19 to Miranda Workman. Professor Workman was your  
15:40:00 20 professor, right?

15:40:01 21 **A.** Yes, that's correct.

15:40:03 22 **Q.** For which course?

15:40:05 23 **A.** Social movements in social change or

15:40:08 1 something like that.

15:40:09 2 **Q.** Okay. You wrote, hello, Professor  
15:40:12 3 Workman, I am e-mailing to ask if a day extension  
15:40:14 4 on my biography of an activist paper would be  
15:40:19 5 possible.

15:40:19 6 So you did, in fact, ask for a day  
15:40:24 7 extension, right?

15:40:25 8 **A.** Yeah, that's correct.

15:40:26 9 **Q.** And Professor Workman granted you that  
15:40:30 10 one day extension, right?

15:40:31 11 **A.** Yes, that's correct.

15:40:45 12 **Q.** Okay. So Professor Workman granted the  
15:40:50 13 extension that you asked for, right?

15:40:52 14 **MS. NANAU:** Objection, asked and answered,  
15:40:54 15 you may answer.

15:40:54 16 **THE WITNESS:** Yeah, correct.

15:40:55 17 **BY MS. NAASSANA:**

15:40:56 18 **Q.** Okay. Did you ask for any personal  
15:41:14 19 supports or accommodations during or after  
15:41:18 20 February 2019?

15:41:21 21 **MS. NANAU:** Objection to the form, you may  
15:41:24 22 answer if you can.

15:41:28 23 **THE WITNESS:** No, I did not. I never felt



15:41:32 1 like -- I didn't know what to ask for and I didn't  
15:41:38 2 feel like if I did that it would be met with -- met  
15:41:42 3 with any enthusiasm or warmth.

15:42:00 4 **BY MS. NAASSANA:**

15:42:00 5 **Q.** Who did you feel would not respond to  
15:42:04 6 you with enthusiasm or warmth?

15:42:07 7 **A.** For starters, Professor Margulis,  
15:42:11 8 because, again, at that point we had been reaching  
15:42:14 9 out to her for support, support in getting the film  
15:42:19 10 footage.

15:42:19 11 And we were constantly shut down and met  
15:42:23 12 with frustration. Support from the Title IX office  
15:42:27 13 because we were constantly asking for meetings and  
15:42:30 14 communication and constantly shut down.

15:42:32 15 There was at least two meetings that we had  
15:42:35 16 requested, one before he was put on leave because  
15:42:38 17 we were terrified and didn't understand what that  
15:42:42 18 would look like, no one told us that there would be  
15:42:45 19 campus security there, no one told us, you know,  
15:42:49 20 that his access to the campus would be cut off.

15:42:51 21 It was just this big question mark, no one  
15:42:53 22 told us to stay away from the health science  
15:42:57 23 building. It was just we're going to talk to him

15:43:01 1 on Thursday or whatever day it was.

15:43:04 2 Oh, my goodness, can you repeat the  
15:43:07 3 question.

15:43:07 4 (The above-requested question was then  
15:43:07 5 read by the reporter.)

15:43:20 6 **THE WITNESS:** Yeah, so the Title IX office  
15:43:22 7 told us over and over again with their actions and  
15:43:25 8 their complete ignorance to requests to meet with  
15:43:29 9 them that they didn't really care about our  
15:43:32 10 experience throughout this case.

15:43:34 11 We were never explicitly told that we could  
15:43:38 12 access the campus counseling or anything like that  
15:43:42 13 if we needed it.

15:43:44 14 And above all else it was just this like big  
15:43:47 15 dirty thing that felt like an evil elephant in the  
15:43:47 16 room that no one would talk about.

15:43:51 17 I knew that our professors were talking  
15:43:53 18 about us but never once did anyone say I'm so sorry  
15:43:57 19 you're going through this.

15:43:59 20 Yeah, so it was -- I didn't feel like anyone  
15:44:03 21 in the faculty or the Title IX office would be  
15:44:08 22 receptive or supportive.

15:44:08 23 **BY MS. NAASSANA:**

15:48:02 1           **A.**     It was my senior year, yeah.

15:48:06 2           **Q.**     Was it both semesters of your senior  
15:48:10 3 year or just one?

15:48:11 4           **A.**     It was both, but the pandemic hit, so  
15:48:15 5 it kind of tapered off the second semester.

15:48:20 6           **Q.**     Did you ultimately end up applying for  
15:48:23 7 this job?

15:48:24 8           **A.**     I did apply for the job.

15:48:26 9           **Q.**     And did you just have to submit this  
15:48:30 10 lesson plan as part of that job?

15:48:32 11           **MS. NANAU:**   Objection to the form of the  
15:48:33 12 question, you may answer.

15:48:33 13           **BY MS. NAASSANA:**

15:48:35 14           **Q.**     Strike that, that was a bad question.

15:48:37 15           What was -- what did the job application to  
15:48:40 16 that job entail?

15:48:42 17           **A.**     Yeah, so this was -- if I recall  
15:48:43 18 correctly, this was after -- I can't remember if  
15:48:48 19 this was expected in the initial application or if  
15:48:52 20 it was something they followed up and requested  
15:48:54 21 sort of after they had whittled down candidates,  
15:48:59 22 but I believe I wrote a cover letter, I had a  
15:49:02 23 résumé.

15:49:03 1 And then, yeah, either at that initial point  
15:49:06 2 or in advance of doing an interview the lesson plan  
15:49:11 3 that I needed to create.

15:49:13 4 **BY MS. NAASSANA:**

15:49:13 5 **Q.** Tell me again what WMNC stands for?

15:49:17 6 **A.** Walking Mountain Science or Nature  
15:49:21 7 Center.

15:49:21 8 **Q.** Where is that located?

15:49:22 9 **A.** Avon, Colorado.

15:49:25 10 **Q.** Okay. Did you ultimately apply for  
15:49:27 11 that job at WMNC?

15:49:30 12 **A.** Yes, I did.

15:49:31 13 **Q.** Okay. Were you accepted for that job  
15:49:36 14 or were you hired?

15:49:36 15 **A.** No, I got through I think the first  
15:49:39 16 round of interviews. I did a faux lesson to them,  
15:49:44 17 but I ultimately did not get the job.

15:49:46 18 **Q.** Why did you reach out to Dr. Russell  
15:49:50 19 for help?

15:49:51 20 **MS. NANAU:** Objection to form, asked and  
15:49:53 21 answered, you may answer.

15:49:54 22 **THE WITNESS:** He had specific expertise as  
15:49:57 23 a -- his specialty was conservation education. It

15:50:01 1 was the nature of the research I did with him.

15:50:03 2 And I knew he was a subject matter expert in  
15:50:06 3 that area. So I reached out to him, because I  
15:50:11 4 thought he would be able to give me impactful  
15:50:16 5 feedback.

15:50:16 6 **BY MS. NAASSANA:**

15:50:17 7 **Q.** Do you think he gave you impactful  
15:50:20 8 feedback?

15:50:20 9 **A.** Yeah, I think his feedback was helpful.

15:50:38 10 **MS. NAASSANA:** Do you mind if we take a  
15:50:41 11 five-minute break.

15:50:42 12 (A recess was then taken at 3:50 p.m.)

15:55:19 13 **BY MS. NAASSANA:**

15:55:22 14 **Q.** Ms. Wood, did there come a time when  
15:55:24 15 you received counseling support at Canisius?

15:55:30 16 **A.** I went to the counseling center once my  
15:55:34 17 freshman year, so my first -- I think it was my  
15:55:39 18 first semester at Canisius.

15:55:42 19 I was going through like a rough breakup and  
15:55:45 20 wanted to talk to someone. It was underwhelming.  
15:55:52 21 I went back for a follow-up the following week and  
15:55:57 22 the man I talked to, whose name I can't even  
15:56:00 23 remember, he completely forgot me.

15:56:03 1 And like I went in with him. He wasn't like  
15:56:07 2 so how have you been. He introduced himself again  
15:56:09 3 and so that was the last time I went there.

15:56:14 4 **Q.** How many appointments did you go to?

15:56:17 5 **A.** That would be two.

15:56:24 6 **Q.** Do you remember the name of the  
15:56:26 7 counselor or therapist that you saw?

15:56:30 8 **A.** No.

15:56:32 9 **MS. NAASSANA:** We previously requested an  
15:56:34 10 authorization for the release of Ms. Wood's  
15:56:37 11 records, if any, from the Canisius Counseling  
15:56:40 12 Center and we have not received them, so...

15:56:42 13 **MS. NANAU:** Right, there's no treatment in  
15:56:42 14 that testimony, right. She wasn't treated. She  
15:56:44 15 went to an initial session, she went back and he  
15:56:46 16 didn't even recognize her.

15:56:48 17 She doesn't recall the name of the  
15:56:50 18 therapist, there was no therapy provided. So if  
15:56:55 19 you want the HIPAA, then we'll give you a HIPAA,  
15:56:58 20 but there was no treatment.

15:57:00 21 **MS. NAASSANA:** I don't understand what you  
15:57:02 22 mean by no treatment. You visited the Canisius  
15:57:03 23 Counseling Center your freshman year, correct?

16:30:20 1 Q. And you'd be able to use your Americorp  
16:30:25 2 education grant towards business school, right?

16:30:27 3 A. Yeah, depending when or if I go. I  
16:30:32 4 think there's an expiration on it.

16:30:34 5 Q. Okay. In terms of your personal  
16:30:39 6 viewpoint, do you feel your Canisius degree is of  
16:30:43 7 any value?

16:30:47 8 A. In terms of like what it's brought me  
16:30:50 9 professionally, no. I think that my work  
16:30:54 10 experience while I was an undergraduate has been  
16:30:58 11 much more applicable and is where I've learned the  
16:31:03 12 most.

16:31:03 13 So, for example, I worked for the Girl  
16:31:06 14 Scouts of Western New York. When I was at  
16:31:10 15 Canisius, I started working for them the summer  
16:31:14 16 after my freshman or sophomore year.

16:31:19 17 So I worked for them for almost three years.  
16:31:22 18 And that was my first introduction into the kind of  
16:31:26 19 work I do now. I would compute demographic data  
16:31:29 20 for the girls in our programs. I would plan  
16:31:29 21 curriculum.

16:31:33 22 I would manage our supplies. I would help  
16:31:36 23 manage partnerships with different schools and

16:31:40 1 community centers. And that work experience and  
16:31:43 2 being able to talk about it really gave me a leg up  
16:31:48 3 and the experience I needed for the job that I do  
16:31:51 4 now and for the Americorp role that I got, because  
16:31:55 5 you know, I very much believe I was selected  
16:31:58 6 because I already had experience working with  
16:32:01 7 students which was the bulk of what that job was  
16:32:04 8 going to entail.

16:32:05 9 And, again, the work I do day-to-day now  
16:32:09 10 it's a lot more adjacent to the work I did at Girl  
16:32:11 11 Scouts. My hiring manager who hired me, Jessica  
16:32:16 12 Weedman, she was an amazing boss and was the deputy  
16:32:19 13 chief of staff at the time, I'm still very close  
16:32:22 14 with her.

16:32:23 15 And she told me that -- I mean, after I was  
16:32:25 16 hired, she would like ask me what school I went to,  
16:32:28 17 because she did not look at it or care about it at  
16:32:32 18 all on the résumé. If anything maybe it was a  
16:32:36 19 checked box, but it certainly was irrelevant that  
16:32:40 20 my degree was in animal behavior, ecology and  
16:32:43 21 conservation in terms of like obtaining my job.

16:32:46 22 I think it was more so the work experience,  
16:32:49 23 internships I did such as through the Alaska



16:33:02 1 Sealife Center and the National Park Service.

16:33:06 2           The fact that I was able to articulate the  
16:33:10 3 outcomes of those experiences really clearly on my  
16:33:15 4 résumé I think is ultimately what gave me a leg up  
16:33:19 5 and the fact that I write a damn good cover letter  
16:33:23 6 and I was told that my cover letter is really what  
16:33:26 7 got me an interview.

16:33:27 8           **Q.**    An interview for what job?

16:33:29 9           **A.**    The operations program assistant role.

16:33:33 10          **Q.**    This Alaska Sealife Service internship,  
16:33:33 11 when did you do that?

16:33:34 12          **A.**    It was the summer after my sophomore  
16:33:40 13 year, I believe. Yeah, because it wasn't right  
16:33:46 14 after I started at Canisius, it had been some time.

16:33:50 15           So, yeah, it was the summer of, what would  
16:33:54 16 that have been, 2018, summer of 2018.

16:33:57 17          **Q.**    How did you get that internship?

16:34:00 18          **A.**    Yeah, so I applied independently, it  
16:34:04 19 wasn't something I applied to through Canisius.  
16:34:07 20 Again, my schtick, my thing at the time was marine  
16:34:10 21 mammals and I wanted to work with them more in the  
16:34:17 22 wild environments and explore -- yeah, explore that  
16:34:24 23 and -- what was question, how I applied?